

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NEW YORK REBAR INSTALLATION, INC. and
UNITED STATES REBAR, INC.,

Plaintiffs,

- against-

ROBERT LEDWITH, TERRENCE MOORE, FRED LEMOINE, KEVIN KELLY, ALFRED G. GEROSA, KEVIN O'BRIEN, JOHN BRUNETTI, and DENNIS ULVERSOY, as TRUSTEES of the LOCAL #46 METALLIC LATHERS UNION AND REINFORCING IRON WORKERS PENSION FUND,
Defendants.

NO. 07-CIV-7607(CM)

**MOTION TO ADMIT
COUNSEL PRO HAC VICE**

ROBERT LEDWITH, TERRENCE MOORE, FRED LEMOINE, KEVIN KELLY, ALFRED G. GEROSA, KEVIN O'BRIEN, JOHN BRUNETTI, and DENNIS ULVERSOY, as TRUSTEES of the LOCAL #46 METALLIC LATHERS UNION AND REINFORCING IRON WORKERS PENSION FUND,
Counterclaim Plaintiffs,

- against -

NEW YORK REBAR INSTALLATION, INC. and
UNITED STATES REBAR, INC., and CHARLES DOHERTY,

Counterclaim Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Ryan P. Farley, a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission pro hac vice of

Applicant's Name: George Basara
Firm Name: Buchanan Ingersoll & Rooney PC

2
AUG 14 2008
8:50 AM
COURT

Address: One Oxford Centre, 20th Floor
City/State/Zip: Pittsburgh, PA 15219-1410
Phone Number: (412) 562-1636
Fax Number: (412) 562-1041

Applicant's Name: David J. Laurent
Firm Name: Buchanan Ingersoll & Rooney PC
Address: One Oxford Centre, 20th Floor
City/State/Zip: Pittsburgh, PA 15219-1410
Phone Number: (412) 562-1857
Fax Number: (412) 562-1041

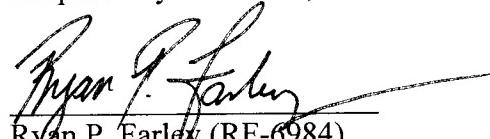
George Basara is a member in good standing of the Bars of the Commonwealth of Pennsylvania, the Pennsylvania Supreme Court, the U.S. District Court for the Western District of Pennsylvania, the U.S. Court of Appeals for the Third Circuit, and the U.S. Court of Appeals for the Sixth Circuit.

David J. Laurent is a member in good standing of the Bars of the Commonwealth of Pennsylvania, the State of West Virginia, the District of Columbia, the U.S. District Court for the Western District of Pennsylvania, the U.S. District Court for the Eastern District of Pennsylvania, the U.S. District Court for the Southern District of West Virginia, the U.S. District Court for the District of Columbia, the U.S. Court of Appeals for the District of Columbia Circuit, the U.S. Court of Appeals for the Third Circuit, the U.S. Court of Appeals for the Fourth Circuit, the U.S. Court of Appeals for the Sixth Circuit, the U.S. Court of Appeals for the Eleventh Circuit, and the Supreme Court of the United States.

There are no pending disciplinary proceedings against George Basara or David J. Laurent in any State or Federal Court.

Dated: August 1, 2008
New York, New York

Respectfully submitted,



Ryan P. Farley (RF-6984)
BUCHANAN INGERSOLL & ROONEY PC
New York Times Building
620 Eighth Avenue, 23rd Floor
New York, NY 10005-1417
Phone: 212-440-4400
Fax: 212-440-4401
E-mail: ryan.farley@bipc.com
*Attorneys for New York Rebar Installation, Inc.,
United States Rebar, Inc., and Charles Doherty*



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

George Basara, Esq.

DATE OF ADMISSION

October 30, 1984

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal
Dated: July 16, 2008



Patricia A. Nicola
Chief Clerk

AO 136
(Rev 4/93)

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA)
WESTERN DISTRICT OF PENNSYLVANIA) ss.
)

I, **ROBERT V. BARTH, JR.**, Clerk of the United States District Court for the Western District of Pennsylvania

DO HEREBY CERTIFY That **GEORGE BASARA** was duly admitted to practice in said Court on November 2, 1984, and is in good standing as a member of the bar of said Court.

Dated at Pittsburgh, Pennsylvania ROBERT V. BARTH, JR.
on July 17, 2008 By Michael J. Lutz
Clerk
Michael J. Lutz Deputy Clerk

**UNITED STATES COURT OF APPEALS FOR
THE
THIRD CIRCUIT
CERTIFICATE OF GOOD STANDING**

I, MARCIA M. WALDRON, Clerk of the United States Court of

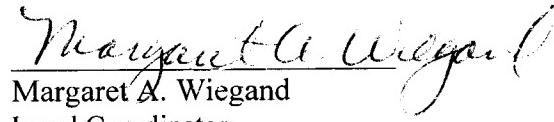
Appeals for the Third Circuit, DO HEREBY CERTIFY THAT

George Basara was admitted to practice before this Court as an attorney and counselor on **June 18, 1992** that he or she has never been suspended nor disbarred, and is presently a member of the bar of this Court in good standing.

I DO FURTHER CERTIFY that there are no grievances or complaints pending before the Disciplinary Committee of this Court against said attorney and counselor.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed the seal of the said Court, at Philadelphia, this 21st day of July 2008.

MARCIA M. WALDRON, Clerk
United States Court of Appeals
For the Third Circuit

By: 
Margaret A. Wiegand
Legal Coordinator

**UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT**

TO ALL WHOM IT MAY CONCERN, GREETINGS:

THIS IS TO CERTIFY THAT

GEORGE BASARA,

OF PITTSBURGH, COMMONWEALTH OF PENNSYLVANIA, WAS ON MOTION, FIRST MADE TO THE COURT ON HIS BEHALF, DULY ADMITTED AND QUALIFIED AS AN ATTORNEY AND COUNSELOR OF THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT ON THE SEVENTH DAY OF MAY, IN THE YEAR OF OUR LORD ONE THOUSAND NINE HUNDRED AND NINETY-TWO, AND THAT HE, IS NOW IN GOOD STANDING.

In Testimony Whereof, I Leonard Green,
Clerk of said Court, have hereunto set my
hand and affixed the seal of the said
Court, at the City of Cincinnati, Ohio this
21st day of July in the year of our Lord
two thousand and eight.

Leonard Green
Clerk, United States Court of Appeals
for the Sixth Circuit


Lance Gifford
Deputy Clerk



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

David J. Laurent, Esq.

DATE OF ADMISSION

December 11, 1980

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal
Dated: July 16, 2008

A handwritten signature in cursive ink, appearing to read "Patricia A. Nicola".

Patricia A. Nicola
Chief Clerk

THE WEST VIRGINIA STATE BAR

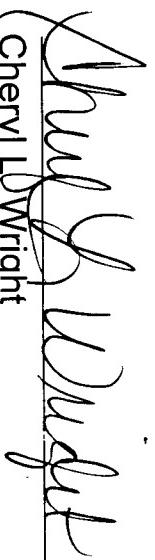
Certificate of Good Standing

David J Laurent - WVSB ID#10656

This is to certify that, according to the records of the West Virginia State Bar, David J Laurent, of Pittsburgh, PA, was admitted to practice law by the West Virginia Supreme Court of Appeals on January 09, 2008, and was registered as an active member of The West Virginia State Bar in January, 2008.

It is further certified that the said David J Laurent, according to our membership records, is currently an member in good standing with The West Virginia State Bar.

Given over my hand and seal of The West Virginia State Bar this day, July 22, 2008.



Cheryl L. Wright
Membership Coordinator
The West Virginia State Bar



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

DAVID J. LAURENT

was on the 18TH day of DECEMBER, 1981

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 18, 2008.

GARLAND PINKSTON, JR., CLERK

M. Charles
By: _____
Deputy Clerk

AO 136
(Rev 4/93)

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA)
WESTERN DISTRICT OF PENNSYLVANIA) ss.
)

I, **ROBERT V. BARTH, JR.**, Clerk of the United States District Court for the Western District of Pennsylvania

DO HEREBY CERTIFY That **DAVID J. LAURENT** was duly admitted to practice in said Court on June 20, 1982, and is in good standing as a member of the bar of said Court.

Dated at Pittsburgh, Pennsylvania ROBERT V. BARTH, JR.
on July 17, 2008 By Michael J. Lutz Deputy Clerk
Clerk

Michael J. Lutz Deputy Clerk

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA



I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That David J. Laurent , Bar # 33150 , was duly admitted to practice in said Court on January 20, 2006 , and is in good standing as a member of the bar of said Court.

DATED at Philadelphia, Pennsylvania

MICHAEL E. KUNZ

Clerk of Court

on July 21, 2008.

BY Aida Ayala
Aida Ayala, Deputy Clerk

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

I ss.

SOUTHERN DISTRICT OF WEST VIRGINIA

I, Teresa L. Deppner, Clerk of the United States
District Court for the Southern District of West Virginia

DO HEREBY CERTIFY THAT

David J. Laurent

was

duly admitted to practice in said Court on January 9, 2008 and is in good standing as a member
of the bar of said Court.

Dated at Charleston _____,
Teresa L. Deppner
Clerk

on August 12, 2008


Deputy Clerk

**United States District Court
for the District of Columbia
CLERK'S OFFICE
333 Constitution Avenue, NW
Washington, DC 20001**

I, **NANCY M. MAYER-WHITTINGTON**, Clerk of the United States

District Court for the District of Columbia, do hereby certify that:

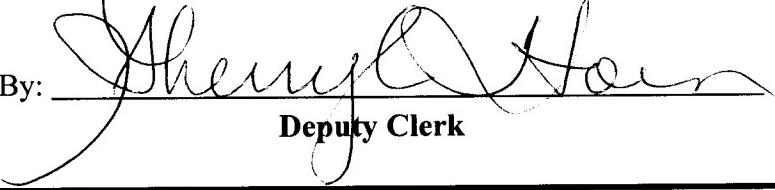
DAVID J. LAURENT

was, on the 23rd day of December A.D. 1996 admitted to practice as an Attorney at Law at the Bar of this Court, and is, according to the records of this Court, a member of said Bar in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of said Court in the City of Washington this 24th day of July A.D. 2008.

NANCY M. MAYER-WHITTINGTON, CLERK

By:

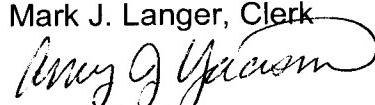

Deputy Clerk

United States Court of Appeals
FOR THE DISTRICT OF COLUMBIA CIRCUIT

Certificate of Good Standing

I, Mark J. Langer, Clerk of the United States Court of Appeals for the District of Columbia Circuit, certify that David J. Laurent was on the 31st day of October, 1990, duly admitted and qualified as an attorney and counselor of the Court of Appeals, and is now a member of the bar of the Court of Appeals in good standing.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of the Court, at the City of Washington, this 22 day of July, 2008.

FOR THE COURT:
Mark J. Langer, Clerk
BY: 
Amy J. Yacisin
Deputy Clerk/CO

**UNITED STATES COURT OF APPEALS FOR
THE
THIRD CIRCUIT
CERTIFICATE OF GOOD STANDING**

I, MARCIA M. WALDRON, Clerk of the United States Court of

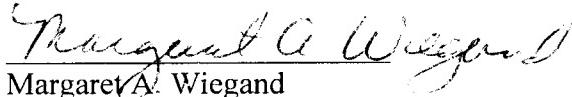
Appeals for the Third Circuit, DO HEREBY CERTIFY THAT

David J. Laurent was admitted to practice before this Court as an attorney and counselor on **April 4, 1983** that he or she has never been suspended nor disbarred, and is presently a member of the bar of this Court in good standing.

I DO FURTHER CERTIFY that there are no grievances or complaints pending before the Disciplinary Committee of this Court against said attorney and counselor.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed the seal of the said Court, at Philadelphia, this 21st day of July 2008.

MARCIA M. WALDRON, Clerk
United States Court of Appeals
For the Third Circuit

By: 
Margaret A. Wiegand
Legal Coordinator



CERTIFICATE OF GOOD STANDING

I, Patricia S. Connor, Clerk of this Court, certify that David J. Laurent was duly admitted to practice in this Court on September 25, 1992, and is in good standing in this Court.

Dated at Richmond, Virginia, on July 29, 2008.

Patricia S. Connor
CLERK

R. J. Honey
DEPUTY CLERK

**UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT**

TO ALL WHOM IT MAY CONCERN, GREETINGS:

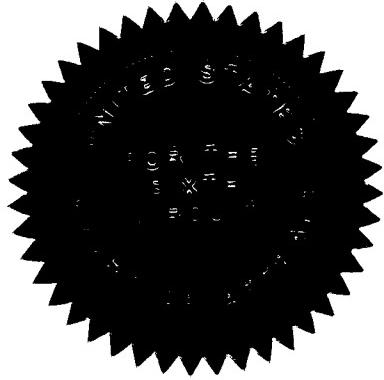
THIS IS TO CERTIFY THAT

DAVID J. LAURENT,

OF PITTSBURGH, COMMONWEALTH OF PENNSYLVANIA, WAS ON MOTION, FIRST MADE TO THE COURT ON HIS BEHALF, DULY ADMITTED AND QUALIFIED AS AN ATTORNEY AND COUNSELOR OF THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT ON THE TWENTY-NINTH DAY OF JANUARY, IN THE YEAR OF OUR LORD ONE THOUSAND NINE HUNDRED AND EIGHTY-SEVEN, AND THAT HE, IS NOW IN GOOD STANDING.

In Testimony Whereof, I Leonard Green,
Clerk of said Court, have hereunto set my hand and affixed the seal of the said Court, at the City of Cincinnati, Ohio this 21st day of July in the year of our Lord two thousand and eight.

Leonard Green
Clerk, United States Court of Appeals
for the Sixth Circuit




Lance Gifford
Deputy Clerk

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA)
COURT OF APPEALS)
FOR THE ELEVENTH CIRCUIT)

I, THOMAS K. KAHN Clerk of the United States

Court of Appeals for the ELEVENTH Circuit, DO HEREBY CERTIFY

That David J. Laurent was duly admitted to practice in said Court
on January 26, 1984 and is in good standing in said Court.

Dated at ATLANTA, GEORGIA
on July 21, 2008

Thomas K. Kahn
Clerk

Tina A. Patterson
Deputy Clerk

Supreme Court of the United States
OFFICE OF THE CLERK
WASHINGTON, D. C. 20543



**DAVID J. LAURENT
OF PITTSBURGH, PA**

was duly admitted and qualified as an Attorney and Counselor for the Supreme Court of the United States on the thirty-first day of October, in the year one thousand nine hundred and ninety-four, and is now a member of the Bar of this Court in good standing.

In testimony, whereof, as Clerk of said Court, I have hereunto set my hand and affixed the seal of said Court, at the City of Washington, this twenty-fifth day of July 2008.



William K. Suter
*Clerk of the Supreme Court
of the United States*

By

A handwritten signature in black ink, appearing to read "Terry Ray".

Assistant Admissions Officer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NEW YORK REBAR INSTALLATION, INC. and
UNITED STATES REBAR, INC.,

Plaintiffs,

- against -

ROBERT LEDWITH, TERRENCE MOORE, FRED
LEMOINE, KEVIN KELLY, ALFRED G. GEROSA,
KEVIN O'BRIEN, JOHN BRUNETTI, and DENNIS
ULVERSOY, as TRUSTEES of the LOCAL #46
METALLIC LATHERS UNION AND
REINFORCING IRON WORKERS PENSION FUND,
Defendants.

NO. 07-CIV-7607(CM)

**AFFIDAVIT OF RYAN P.
FARLEY IN SUPPORT OF
MOTION TO ADMIT
COUNSEL PRO HAC VICE**

ROBERT LEDWITH, TERRENCE MOORE, FRED
LEMOINE, KEVIN KELLY, ALFRED G. GEROSA,
KEVIN O'BRIEN, JOHN BRUNETTI, and DENNIS
ULVERSOY, as TRUSTEES of the LOCAL #46
METALLIC LATHERS UNION AND
REINFORCING IRON WORKERS PENSION FUND,
Counterclaim Plaintiffs,

- against -

NEW YORK REBAR INSTALLATION, INC. and
UNITED STATES REBAR, INC., and CHARLES
DOHERTY,

Counterclaim Defendants.

State of New York)
) ss:
County of New York)

Ryan P. Farley, being duly sworn, hereby deposes and says as follows:

1. I am Counsel to Buchanan Ingersoll & Rooney PC, counsel to Plaintiffs and Counterclaim Defendants (collectively, "Plaintiffs") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit George Basara and David J. Laurent as counsel pro hac vice to represent Plaintiffs in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in March 1999. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known George Basara and David J. Laurent for over a year.

4. Mr. Basara and Mr. Laurent are shareholders with Buchanan Ingersoll & Rooney PC in Pittsburgh, Pennsylvania.

5. I have found Mr. Basara and Mr. Laurent to be skilled attorneys and persons of integrity. They are experienced in federal practice, familiar with the Federal Rules of Civil Procedure, and admitted to the bars of other federal courts.

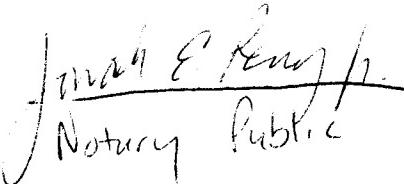
6. Accordingly, I am pleased to move the admission of George Basara and David J. Laurent, pro hac vice.

7. I respectfully submit a proposed order granting the admission of George Basara and David J. Laurent, pro hac vice, which is attached as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit George Basara and David J. Laurent, pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.

Dated: August 1, 2008
New York, New York

Notarized:



Notary Public

JONAH E. PERRY JR.
Notary Public, State of New York
No. 01PE5088103
Qualified in New York County
Certificate Filed in New York County
Commission Expires October 6, 2009

Respectfully submitted,



Ryan P. Farley (RF-6984)
BUCHANAN INGERSOLL & ROONEY PC
New York Times Building
620 Eighth Avenue, 23rd Floor
New York, NY 10005-1417
Phone: 212-440-4400
Fax: 212-440-4401
E-mail: ryan.farley@bipc.com
*Attorneys for New York Rebar Installation, Inc.,
United States Rebar, Inc., and Charles Doherty*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NEW YORK REBAR INSTALLATION, INC. and
UNITED STATES REBAR, INC.,

Plaintiffs,

- against-

ROBERT LEDWITH, TERRENCE MOORE, FRED
LEMOINE, KEVIN KELLY, ALFRED G. GEROSA,
KEVIN O'BRIEN, JOHN BRUNETTI, and DENNIS
ULVERSOY, as TRUSTEES of the LOCAL #46
METALLIC LATHERS UNION AND REINFORCING
IRON WORKERS PENSION FUND,

Defendants.

NO. 07-CIV-7607(CM)

**PROPOSED ORDER FOR
ADMISSION PRO HAC VICE
ON WRITTEN MOTION**

ROBERT LEDWITH, TERRENCE MOORE, FRED
LEMOINE, KEVIN KELLY, ALFRED G. GEROSA,
KEVIN O'BRIEN, JOHN BRUNETTI, and DENNIS
ULVERSOY, as TRUSTEES of the LOCAL #46
METALLIC LATHERS UNION AND REINFORCING
IRON WORKERS PENSION FUND,

Counterclaim Plaintiffs,

- against -

NEW YORK REBAR INSTALLATION, INC. and
UNITED STATES REBAR, INC., and CHARLES
DOHERTY,

Counterclaim Defendants.

Upon the motion of Ryan P. Farley, attorney for NEW YORK REBAR
INSTALLATION, INC., UNITED STATES REBAR, INC., and CHARLES DOHERTY, and
said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED THAT

Applicant's Name: George Basara
Firm Name: Buchanan Ingersoll & Rooney PC
Address: One Oxford Centre, 20th Floor
City/State/Zip: Pittsburgh, PA 15219-1410
Phone Number: (412) 562-1636
Fax Number: (412) 562-1041

Applicant's Name: David J. Laurent
Firm Name: Buchanan Ingersoll & Rooney PC
Address: One Oxford Centre, 20th Floor,
City/State/Zip: Pittsburgh, PA 15219-1410
Phone Number: (412) 562-1857
Fax Number: (412) 562-1041
Email address: david.laurent@bipc.com

are admitted to practice pro hac vice as counsel for NEW YORK REBAR INSTALLATION, INC., UNITED STATES REBAR, INC., and CHARLES DOHERTY in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
New York, New York

United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NEW YORK REBAR INSTALLATION, INC. and :
UNITED STATES REBAR, INC., :
:-----

Plaintiffs, :
:-----

- against- :
:-----

ROBERT LEDWITH, TERRENCE MOORE, FRED
LEMOINE, KEVIN KELLY, ALFRED G. GEROSA,
KEVIN O'BRIEN, JOHN BRUNETTI, and DENNIS
ULVERSOY, as TRUSTEES of the LOCAL #46
METALLIC LATHERS UNION AND
REINFORCING IRON WORKERS PENSION FUND,
Defendants. :
:-----

**AFFIDAVIT OF SERVICE
BY MAIL**

ROBERT LEDWITH, TERRENCE MOORE, FRED
LEMOINE, KEVIN KELLY, ALFRED G. GEROSA,
KEVIN O'BRIEN, JOHN BRUNETTI, and DENNIS
ULVERSOY, as TRUSTEES of the LOCAL #46
METALLIC LATHERS UNION AND
REINFORCING IRON WORKERS PENSION FUND,
Counterclaim Plaintiffs, :
:-----

- against - :
:-----

NEW YORK REBAR INSTALLATION, INC. and :
UNITED STATES REBAR, INC., and CHARLES
DOHERTY, :
:-----

Counterclaim Defendants. :
:-----

STATE OF NEW YORK)
:) ss.:
COUNTY OF NEW YORK)

Jonah E. Perry Jr., duly sworn, deposes and says: that deponent is not a party to the
within action, is over 18 years of age and is employed at BUCHANAN INGERSOLL &
ROONEY PC, New York Times Building, 620 Eighth Avenue, 23rd Floor, New York, New
York 10018.

That on the 14th day of August, 2008, deponent served the annexed Motion to Admit Counsel Pro Hac Vice along with the supporting Affidavit and Proposed Order by regular mail upon the following named persons in the above entitled action at the addresses given below:

Andrew J. Weinstein, Esq.
Law Offices of Andrew J. Weinstein
521 Fifth Avenue, Suite 3300
New York, New York 10175

and

Richard H. Markowitz, Esq.
Markowitz and Richman
121 S. Broad Street
Philadelphia, PA 19107

by depositing true copies of same enclosed in a postpaid properly addressed wrapper(s), in a post office official depository under the exclusive care and custody of the United States Postal Services within New York County.



Jonah E. Perry Jr.

Sworn to before me this
14th day of August, 2008


Notary Public

MARIE GALVIN MOTT
Notary Public, State of New York
No. 01MO4795926
Qualified in Kings County
Certificate Filed in New York County
Commission Expires <u>8-21-2011</u>